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Attorneys for MetLife Home Loans and
Federal National Mortgage Association

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

KATHLEEN R. HAIDER,

Case No. 3:12-cv-607-SI

Plaintiff,

v.

JOINT MOTION TO STAY PROCEEDINGS
AND STRIKE CASE MANAGEMENT
DEADLINES

**FIRST AMERICAN TITLE INSURANCE
COMPANY; FEDERAL NATIONAL
MORTGAGE ASSOCIATION; and
METLIFE HOME LOANS, A DIVISION OF
METLIFE BANK, N.A.,**

Defendants.

LR 7-1 CERTIFICATE OF CONFERRAL

Counsel for defendants MetLife Home Loans, a division of MetLife Bank, N.A. (“MetLife Bank”) and Federal National Mortgage Association (“Fannie Mae”), certifies that he conferred with plaintiff prior to filing this Motion, and that plaintiff does not object to the contents contained herein. Counsel for First American Title Insurance Company (“First American”) joins in this Motion.

PAGE 1 - JOINT MOTION TO STAY PROCEEDINGS AND STRIKE CASE
MANAGEMENT DEADLINES

MOTION

Pursuant to Fed. R. Civ. P. 6(b), defendants MetLife Bank, Fannie Mae, and First American hereby respectfully request that the Court stay this case for ninety (90) days while plaintiff completes a loan modification review, and also strike the case management deadlines until such further time as may be appropriate.

This lawsuit was filed on March 2, 2012. MetLife Bank and Fannie Mae removed the lawsuit to this court on April 9, 2012. (ECF No. 1.) At the time of the filing of this lawsuit, plaintiff was represented by counsel, but plaintiff's counsel was later granted leave to withdraw on July 10, 2012. (ECF No. 17.)

On August 27, 2012, plaintiff and counsel for MetLife Bank and Fannie Mae conferred via telephone, where plaintiff indicated her interest in pursuing a loan modification, and expressed that a change in her financial circumstances may make her a more attractive candidate for a loan modification. Because resolution of this matter may be achieved through a loan modification, the parties agreed to request that all proceedings in this action be stayed while the loan modification review process continues.

The parties agree that the stay should be effective for an initial period of ninety (90) days from the date of entry of an Order on this Motion, at which time, if not before, the parties will report back to the Court of the outcome of loan modification efforts and their recommendations to the Court regarding further proceedings.

Additionally, the parties respectfully request that the Court strike all case management deadlines and, if necessary, reset the case management deadlines after receipt of the parties' status report to the Court. The parties request this extension to preserve the resources of the Court and the parties while a possible resolution of this lawsuit is explored.

This Motion is made in good faith and is not intended for the purpose of delay, and no party will be prejudiced by the granting of this Motion.

DATED: August 29, 2012

LANE POWELL PC

By /s/ Brian T. Kiolbasa
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Attorneys for Defendant First American Title
Insurance Company

PAGE 3 - JOINT MOTION TO STAY PROCEEDINGS AND STRIKE CASE
MANAGEMENT DEADLINES

CERTIFICATE OF SERVICE

I hereby certify that on August 29, 2012, I caused to be served a copy of the foregoing JOINT MOTION TO STAY PROCEEDINGS AND STRIKE CASE MANAGEMENT DEADLINES on the following person(s) in the manner indicated below at the following address(es):

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- ☐ by CM/ECF
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- ☒ by First Class Mail
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- ☐ by First Class Mail
- ☐ by Hand Delivery
- ☐ by Overnight Delivery

Brian T. Kiolbasa

CERTIFICATE OF SERVICE